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TOYOTA MOTOR CREDIT  
CORPORATION

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

MARK CONKLIN,

Plaintiff,

vs.

EQUIFAX, INC.; TOYOTA MOTOR  
CREDIT CORPORATION; and DOES 1  
through 100 inclusive,

Defendants.

Case No. 5:15-CV-05114-EJD-NMC

**STIPULATION TO EXTEND TIME  
FOR TOYOTA MOTOR CREDIT  
CORPORATION TO RESPOND TO  
COMPLAINT  
[L.R. 6-1]**

Compl. Filed: November 9, 2015  
Trial Date: None set

The Hon. Edward J. Davila

Pursuant to Local Rule 6-1, Plaintiff Mark Conklin (“Plaintiff”) and Defendant Toyota Motor Credit Corporation (“TMCC”) by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, Plaintiff filed the Complaint in this action on November 9, 2015;  
WHEREAS, on December 8, 2015, TMCC was served with the Complaint;  
WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), TMCC’s final day to answer or otherwise respond to Plaintiff’s Complaint was December 29, 2015;

WHEREAS, TMCC's counsel was recently retained in this matter and, due to an administrative error, the undersigned did not receive notice of the lawsuit or a copy Complaint until after the time to respond had passed;

WHEREAS, TMCC requires additional time to review the allegations before responding to the Complaint;

WHEREAS, Plaintiff has agreed to grant TMCC an extension of time, until January 15, 2016, to respond to the Complaint,

WHEREAS, an Initial Case Management Conference has been set for April 21, 2016 at 10:00 a.m. in Courtroom 4, and a Joint Case Management Statement is due for filing by April 14, 2016.

WHEREAS, extending TMCC's time to respond to the complaint until January 15, 2016 will not alter the date of any deadline fixed by Court order;

NOW, THEREFORE, the Parties hereby stipulate that TMCC shall have up to and including January 15, 2016, to respond to Plaintiff's Complaint.

**IT IS SO STIPULATED.**

DATED: January 12, 2016

SAGARIA LAW. P.C.

By /s/ Elliot W. Gale

Elliot W. Gale  
Attorneys for Plaintiff  
Mark Conklin

DATED: January 12, 2016

REED SMITH LLP

By /s/ Cristyn N. Chadwick<sup>1</sup>

Cristyn N. Chadwick  
Attorneys for Defendant  
Toyota Motor Credit Corporation

<sup>1</sup> Pursuant to Northern District Local Rule 5-1(i)(3), filing counsel attests that all other signatories listed and on whose behalf this filing is submitted concur in the filing's content and have authorized the filing.